

EXHIBIT 24

CONFIDENTIAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, WILLIAM BYATT,) Case No.
JEREMY DAVIS, CHRISTOPHER) 5:20-cv-03664-LHK-
CASTILLO, and MONIQUE TRUJILLO) SVK
individually and on behalf of)
all other similarly situated,)
Plaintiffs,)
vs.)
GOOGLE LLC,)
Defendant.)

CONFIDENTIAL

VIRTUAL VIDEOCONFERENCE VIDEO-RECORDED

DEPOSITION OF ON AMIR, PH.D.

Tuesday, August 16, 2022

Remotely Testifying from La Jolla, California

Stenographically Reported By:

Hanna Kim, CLR, CSR No. 13083

Job No. 5344524

PAGES 1 - 310

Page 1

CONFIDENTIAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, WILLIAM BYATT,) Case No.
JEREMY DAVIS, CHRISTOPHER) 5:20-cv-03664-LHK-
CASTILLO, and MONIQUE TRUJILLO) SVK
individually and on behalf of)
all other similarly situated,)
Plaintiffs,)
vs.)
GOOGLE LLC,)
Defendant.)

Confidential, virtual videoconference
video-recorded deposition of ON AMIR,
PH.D., remotely testifying from La Jolla,
California, taken pursuant to the
stipulations of counsel thereof, on
Tuesday, August 16, 2022, before Hanna
Kim, CLR, Certified Shorthand Reporter,
No. 13083.

CONFIDENTIAL

REMOTE VIDEOCONFERENCE APPEARANCES OF COUNSEL:

For Plaintiffs:

BOIES SCHILLER FLEXNER LLP

BY: BEKO O. REBLITZ-RICHARDSON, ESQ.

BY: MARK C. MAO, ESQ.

BY: ALISON ANDERSON, ESQ.

100 SE 2nd St., 28th Floor

Miami, Florida 33131

305.539.8400

brichardson@bsfllp.com

-and-

MORGAN & MORGAN LAW FIRM

BY: MICHAEL RAM, ESQ.

711 Van Ness Avenue, Suite 500

San Francisco, California 94102-3275

415.358.6913

mram@forthepeople.com

Page 3

CONFIDENTIAL

1 REMOTE APPEARANCES OF COUNSEL: (CONTINUED)

2
3 For Defendant:

4 QUINN EMANUEL URQUHART & SULLIVAN, LLP

5 BY: ALYSSA "ALY" OLSON, ESQ.

6 865 S. Figueroa Street, 10th Floor

7 Los Angeles, California 90017

8 213.443.3000

9 alyolson@quinnemanuel.com

10
11 For Plaintiffs: (Calhoun vs. Google)

12 SIMMONS HANLY CONROY

13 BY: AN TRUONG, ESQ,

14 112 Madison Avenue, 7th Floor

15 New York, New York 10016-7416

16 212.257.8482

17 atruong@simmonsfirm.com

18
19
20 Also Present:

21 MARK KEEGAN, for Plaintiffs

22 Haimin Zhang, Analysis Group

23 SEAN GRANT, Videographer

24
25
Page 4

CONFIDENTIAL

1 parts.

2 Q. Right.

3 A. Yes.

4 Q. And so, you see there in Question 16,

5 Mr. Keegan asked about consent; right? 02:19:14

6 A. Yes -- Question 16. Well, you jumped one.

7 Consent. He asked about consent.

8 Q. And then with Question 17, you see --

9 A. Wait, wait, wait. Stop.

10 My point is it's not clear -- I don't 02:19:32

11 understand what consent means. Why would responders

12 understand what consent means?

13 Q. Did you test whether people understand

14 what consent means?

15 A. No, because it's a legal question. It's 02:19:44

16 not -- it has nothing to do with actual perceptions.

17 Q. Did you ask any questions regarding

18 consent?

19 A. No. Exactly for that point.

20 Q. And then Question 17, Mr. Keegan asked 02:19:55

21 about people visiting non-Google websites; right?

22 MS. OLSON: Objection to the form.

23 THE WITNESS: Question 17, he says, "Which

24 of the following best reflects your opinion? I

25 believe that when I am in private browsing mode, I 02:20:13

Page 258

CONFIDENTIAL

JURAT

I, ON AMIR, PH.D., do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken remotely on Tuesday, August 16, 2022; that I have made such corrections as appear noted herein in ink, initialed by me; that my testimony as contained herein, as corrected, is true and correct.

Dated this 17 day of September, 2022,
at San Diego, California.



ON AMIR, PH.D.